IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS,
EASTERN DIVISION

WILMER CATALAN-RAMIREZ,	)	
	)	
Plaintiff,	)	No. 17 CV 3258
v.	)	
	)	Judge Joan H. Lefkow
	)	
RICARDO WONG, *et al.*,	)	Magistrate Judge Jeffrey Cole
	)	
Defendants.	)	

MEMORANDUM OF LAW IN SUPPORT OF MCHENRY COUNTY DEFENDANTS' MOTION TO SEVER AND TRANSFER VENUE TO THE WESTERN DIVISION OR, IN THE ALTERNATIVE, TO DISMISS THEM FROM COUNTS III, V AND VI THE AMENDED COMPLAINT

Facts

Plaintiff alleges that on January 15, 2017, he was shot multiple times in a drive-by shooting in the Back-of-the-Yards neighborhood in Chicago. Plaintiff alleges that, as a result of this incident, he is partially paralyzed on his left side and requires medical attention and rehabilitative treatment. Plaintiff also alleges that he requires a left ankle brace and "sneakers" to walk safely. Plaintiff alleges that he requires multiple medications and physical therapy. In addition, plaintiff alleges that he cannot feed, bathe or dress himself without assistance. Am. Compl. (Doc. # 21), ¶¶ 3, 63.

Plaintiff further alleges that on March 27, 2017, agents of U.S. Immigration and Customs Enforcement ("ICE") arrested him at his home. Plaintiff claims that the agents who arrested him used excessive force such that during the arrest he suffered a fractured shoulder. *Id.* ¶ 4.

After he was arrested, plaintiff alleges that he was taken to the McHenry County Jail, where he is currently being held. Plaintiff alleges that he is being denied necessary medical care for the injuries he sustained during the January 15, 2017, shooting, as well as those he alleges he sustained during his arrest. *Id.* ¶ 7.

Plaintiff brought this action against, among others, the Sheriff of McHenry County, Bill Prim, the Chief Administrative Officer of the McHenry County Jail, David Devane, and McHenry County. *Id.* ¶¶ 13-15. Both Sheriff Prim and Chief Devane are sued only in their official capacities. *Id.* ¶¶ 13, 14.

Argument

The Claims Against the McHenry County Defendants Should be Severed and Transferred to the Western Division.

I. Severance is Appropriate.

The Court should sever the claims against Sheriff Prim, Chief Devane and McHenry County (Counts III-VI), and transfer them to the Western Division.[1] The claims against these defendants clearly differ from those alleged against the other defendants, and concern only events that occurred after plaintiff was transferred to the McHenry County Jail. Am. Compl. (Doc. # 21), Cts. III-VI. These claims allege, *inter alia*, that the medical care received by plaintiff at the Jail is inadequate and that the Jail is not providing the assistance he allegedly needs to bathe, dress and feed himself. *Id.*

The claims against the other defendants concern an alleged Chicago gang

[1] Defendants Correct Care Solutions LLC ("CCS") and Michael Keegan previously brought a motion to sever and transfer to the Western Division (Doc. # 25), which was denied by the Court without prejudice (Doc. # 42).

database and the plaintiff's arrest by ICE, all of which allegedly occurred before the plaintiff was transferred to the McHenry County Jail. *Id.*, Cts. I, II and VII-X. There are no allegations that the McHenry County Defendants were involved in that conduct.

Rule 21, Fed. R. Civ. P., authorizes the Court to sever any misjoined party or claim at any state of the lawsuit. Although that rule does not set forth a standard for proper joinder, the courts have applied the permissive joinder requirements of Rule 20(a), Fed. R. Civ. P., which provides that parties are properly joined where the claims asserted against them "aris[e] out of the same transaction, occurrence, or series of transactions or occurrences" and raise common questions of law and fact. *Id. George v. Smith,* 507 F.3d 605, 607 (7th Cir. 2007) ("Unrelated claims against different defendants belong in different suits"). In this case, there are no common issues of law and fact between the allegations against the McHenry County Defendants (and CCS and Michael Keegan) and the allegations against the other defendants.

Even if plaintiffs satisfy the requirements for permissive joinder under Rule 20(a), the court has discretion to sever a party at any time "if doing so will increase judicial economy and avoid prejudice to the litigants." *Purzel Video GmbH v. Does* 1-84, No. 13 C 2501, 2013 U.S. Dist. LEXIS 116788, 2013 WL 4478903, at *5 (N.D. Ill. Aug. 16, 2013). Among the factors considered are when the alleged conduct occurred, whether the same people were involved, whether the conduct was similar, and whether it implicated a system of decision-making or widely-held

policy. *Martinez v. Haleas*, 2010 U.S. Dist. LEXIS 31498, 2010 WL 1337555 (N.D. Ill. Mar. 30, 2010), citing *Wilson v. Peslak,* 2005 U.S. Dist. LEXIS 10365, 2005 WL 1227316 (N.D. Ill. May 12, 2005).

Here, the claims against the other parties involve allegations that plaintiff was improperly labeled as a gang member by the Chicago Police Department, which allegedly maintains a gang database, in which plaintiff was wrongly included. Am. Compl. (Doc. #21) ¶¶ 43-44. Plaintiff further claims that on the basis of his allegedly false inclusion in the gang database, he was arrested by Immigration and Customs Enforcement, during which he claims ICE used excessive force. *Id.* ¶¶ 34-36, 46. These allegations are separate from and unrelated to the claims against the McHenry County Defendants who had no involvement in the development of the gang database or the arrest carried out by ICE. The dissimilarity of allegations against the McHenry County Defendants (and CCS and Michael Keegan) and the other defendants is quite stark and would result in prejudice to these defendants if all claims are tried together.[2]

II. The Claims Against the McHenry County Defendants Should be Transferred to the Western Division.

28 U.S.C. §1404(a) provides, in relevant part: "For the convenience of the parties and witnesses, in the interest of justice, a district court may transfer any civil action to any other district or division where it might have been brought."

The Northern District of Illinois has no local rule that differentiates between

[2]Plaintiff includes defendant Ricardo Wong in Count VI. Am Compl. Doc. # 21, Ct. VI. However, the allegations in that count concern only acts allegedly taken by the McHenry County Defendants.

proper venue in the Eastern or Western Division. Thus, this action would be properly brought in either division. *Rorah v. Petersen Health Care*, No. 13 C 1827, 2013 U.S. Dist. LEXIS 94536 at *5-6 (N.D. Ill. July 8, 2013), citing *Research Automation, Inc. v. Schrader-Bridgeport Int'l, Inc.*, 626 F.3d 973, 978-79 (7th Cir. 2010). An inter-division transfer is appropriate where (1) venue is proper in the transferor and transferee divisions, (2) the transferee division is more convenient for both the parties and the witnesses, and (3) the transfer would serve the interests of justice. *Thomas v. City of Woodstock,* No. 11 C 3602, 2011 U.S. Dist. LEXIS 98371 at *2 (N.D. Ill. Aug. 30, 2011).

In evaluating whether a transfer is proper for the convenience of the parties the court shall consider: "(1) the plaintiff's choice of forum; (2) the situs of material events; (3) the relative ease of access to sources of proof; (4) the convenience of the witnesses; and (5) the convenience of the parties." *Rorah,* 2013 U.S. Dist. LEXIS 94536 at *6.

Generally, the plaintiff's initial choice of forum is given substantial weight, but this factor bears less weight where the cause of action did not conclusively arise in the chosen forum. *Rorah,* 2013 U.S. Dist. LEXIS 94536 at *7; *Doage v. Board of Regents,* 950 F.Supp. 258, 261 (N.D. Ill. 1997). The claims against the McHenry County Defendants all arose in McHenry County, which is in the Western Division.

The location of all material events involving the McHenry County Defendants and the lack of any significant connection between those events to the plaintiff's choice of forum weigh heavily in favor of transfer. *Avco Corp. v. Progressive Steel*

Treating, Inc., No. 05 C 4364, 2005 U.S. Dist. LEXIS 22964 at *6-7 (N.D. Ill. Oct. 6, 2005). The plaintiff was transferred to and incarcerated in the McHenry County Jail where he received medical care by defendant CCS and other medical providers in McHenry County. Am. Compl. (Doc. # 21) ¶¶ 7, 16-17, 54-56, 59, 68. Nothing involving the McHenry County Defendants is alleged to have occurred in the Eastern Division. "[T]he location of the material events giving rise to the case becomes comparatively more important when it differs from the plaintiff's choice of forum." *Gulf Coast Bk. & Tr. Co. v. Home State Bk., N.A.*, No. 11 C 2617, 2011 U.S. Dist. LEXIS 128359 at *8 (N.D. Ill. Nov 4, 2011).

Convenience of witnesses is often considered the most significant factor in the balancing test to determine whether transfer between divisions is proper. *Rorah*, 2013 U.S. Dist. LEXIS 94536 at *10, quoting *St. Paul Fire & Marine Ins. Co. v. Brother Int'l Corp.*, No. 05 C 5484, 2006 U.S. Dist. LEXIS 39952 at *11 (N.D. Ill. June 1, 2006). The witnesses in this case will include Sheriff Prim and Chief Devane, McHenry County corrections officers, CCS medical staff in the Jail, including Dr. Kim and Michael Keegan, and doctors and other medical professionals who provided medical care to plaintiff in McHenry County. It is unlikely that any of the other defendants will have any knowledge of plaintiff's medical care in McHenry County, conditions at the Jail or plaintiff's claims with respect to his detention there.

The inconvenience of travel to court in the Eastern Division for the McHenry County parties and witnesses cannot be expressed merely in terms of miles between

McHenry County and Chicago. While the Eastern Division courthouse in Chicago is only around 20 miles farther from McHenry County than the Western Division courthouse in Rockford, "Chicago's heavier traffic and congestion make travel from Woodstock to Chicago decidedly more unpredictable, inconvenient, and time-consuming than travel from Woodstock to Rockford." *Thomas,* 2011 U.S. Dist. LEXIS 98371 at *3; *Wilhelm v. Cruz,* No. 10 C 2718, 2010 U.S. Dist. LEXIS 131019 at *4 (N.D. Ill. Dec. 9, 2010) (same). While the location of events, witnesses, and parties weigh in favor of transfer, the location of counsel should not be considered in assessing convenience. *Thomas,* 2011 U.S. Dist. LEXIS 98371 at *3 ([t]he location of counsel . . . is not a relevant factor under § 1404(a)"), quoting *SEC v. Kasirer*, No. 04 C 4340, 2005 U.S. Dist. LEXIS 6494 at *6 (N.D. Ill. March 21, 2005).

In evaluating the third and final factor, whether the transfer will serve the interests of justice, "courts consider (1) the familiarity of the courts with the applicable law; (2) the speed at which the case will proceed to trial; and (3) the desirability of resolving controversies in the respective locales." *Bjoraker v. Dakota, Minn. & Eastern R.R. Corp.*, No. 12 C 7513, 2013 U.S. Dist. LEXIS 34161 at *18 (N.D. Ill. March 12, 2013). Although these factors are given less weight in the case of an intra-district transfer, *id.*, because all of the material events involving the McHenry County Defendants occurred in the Western Division, the Western Division has a greater interest in resolving this case. *Id.* at *19; *Rorah,* 2013 U.S. Dist. LEXIS 94536 at *14; *Avco Corp.*, 2005 U.S. Dist. LEXIS 22964 at *10.

When all of the relevant factors are weighed, the balance favors transfer to the Western Division, because there is no connection between the events alleged against the McHenry County Defendants and the Eastern Division, the Western Division is more convenient for all likely witnesses, and transfer to the Western Division promotes the efficient administration of justice.

The Claims Against the McHenry County Defendants in Counts III, V and VI Should be Dismissed.

A Rule 12(b)(6) motion to dismiss challenges the sufficiency of the amended complaint. Fed. R. Civ. P. 12(b)(6); *Gibson v. City of Chicago*, 910 F.2d 1510, 1520 (7th Cir. 1990). In considering a motion to dismiss, the Court accepts as true all well-pleaded facts in the plaintiff's amended complaint and draws all reasonable inferences from those facts in the plaintiff's favor. *AnchorBank, FSB v. Hofer*, 649 F.3d 610, 614 (7th Cir. 2011). To survive a motion to dismiss, the amended complaint "must contain sufficient factual matter, accepted as true, to state a claim to relief that is plausible on its face. . . . A claim has facial plausibility when the plaintiff pleads factual content that allows the court to draw the reasonable inference that the defendant is liable for the misconduct alleged." *Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009). In other words, "it is not enough for a complaint to *avoid foreclosing* possible bases for relief; it must actually *suggest* that the plaintiff has a right to relief, by providing allegations that 'raise a right to relief above the speculative level.'" *EEOC v. Concentra Health Services, Inc.*, 496 F.3d 773, 777 (7th Cir. 2007), quoting *Bell Atlantic Corp. v. Twombly*, 550 U.S. 544, 555 (2009) (emphasis in original).

I. Count III of the Amended Complaint Fails to State a Claim Under 42 U.S.C. § 1983 Against Defendants Prim and Devane.

As a pre-trial detainee, the plaintiff is entitled, under the Fourteenth Amendment, to the same right to be free of cruel and unusual punishment as a prisoner who has been convicted is entitled to under the Eighth Amendment. *Williams v. Rodriguez*, 509 F.3d 392, 407 (7th Cir. 2007). Accordingly, in order to state a claim under section 1983 for injuries resulting from inadequate medical care of a pre-trial detainee, a plaintiff must allege that the defendant "knows of and disregards an excessive risk to inmate health or safety." *Farmer v. Brennan,* 511 U.S. 825, 837 (1994); *Chatham v. Davis,* 839 F.3d 679, 684 (7th Cir. 2016).

Count III purports to state a claim for failure to provide medical care, seeking declaratory and injunctive relief against, *inter alia,* defendants Prim and Devane. Both Prim and Devane are sued in their official capacities only. Am. Compl. (Doc. # 21) ¶ 83.

Because the claims against Sheriff Prim and Chief Devane are alleged in their official capacity, they are treated as claims against the County. *Belbachir v. County of McHenry,* 726 F.3d 975, 982 (7th Cir. 2013); *Grieveson v. Anderson,* 538 F.3d 763, 771 (7th Cir. 2008) ("Governmental entities cannot be held liable for the unconstitutional acts of their employees unless those acts were carried out pursuant to an official custom or policy"), citing *Monell v. Dep't of Soc. Servs.*, 436 U.S. 658, 694 (1978). There is no *respondeat superior* liability under § 1983. *Monell,* 436 U.S. at 691; *Hahn v. Walsh,* 762 F.3d 617, 639 (7th Cir. 2014). Simply put, "individual liability under 42 U.S.C. § 1983 can only be based on a finding that the defendant caused the deprivation at issue." *Palmer v. Marion County*, 327 F.3d 588, 594 (7th Cir. 2003), quoting *Kelly v. Municipal Courts of Marion County*, 97 F.3d 902, 909 (7th Cir. 1996). The amended complaint alleges no wrongdoing against defendants Prim or Devane individually.

The amended complaint is fatally deficient because it fails to allege an unconstitutional policy, custom or practice against the County. *Monell*, 436 U.S. at 690; *Thomas v. Cook County Sheriff's Dep't*, 604 F.3d 293, 303 (7th Cir. 2009) ("the plaintiff must demonstrate that there is a policy at issue rather than a random event"). "Misbehaving employees are responsible for their own conduct, 'units of local government are responsible only for their policies rather than misconduct by their workers.'" *Lewis v. City of Chicago*, 496 F.3d 645, 656 (7th Cir. 2007), quoting *Fairley v. Fermaint*, 482 F.3d 897, 904 (7th Cir. 2007); *Wagner v. Washington County*, 493 F.3d 833, 836 (7th Cir. 2007) (in order to state a claim against a governmental entity, plaintiff must allege "an official policy, widespread custom, or deliberate act of a county decision-maker of the municipality or department"). The requirement to plead a policy, custom or practice applies whether the plaintiff is seeking money damages or, as in this case, declaratory and injunctive relief. *L.A. County v. Humphries*, 562 U.S. 29, 31 (2010).

Furthermore, the plaintiff must allege that the policy was the "direct cause" or the "moving force" behind the constitutional violation. *Oklahoma City v. Tuttle*, 471 U.S. 808, 820 (1985); *Monell*, 436 U.S. at 694 ("it is when execution of a government's policy or custom, whether made by its lawmakers or by those whose edicts or acts may fairly be said to represent official policy, inflicts the injury that the government as an entity is responsible under § 1983"). "There must be an *affirmative link between the policy and the particular constitutional violation* alleged." *Tuttle*, 471 U.S. at 823.

The amended complaint in this case fails to allege a policy or practice that violated plaintiff's right to adequate medical care and that such a policy or practice caused him harm. *Minix v. Canarecci*, 597 F.3d 824, 832 (7th Cir. 2010). Plaintiff alleges that he suffered various injuries as a result of being shot on January 15, 2017, and that he incurred additional injuries during his arrest by ICE. Am. Compl. (Doc. # 21), ¶¶ 3-4. Plaintiff alleges various medical treatment he claims to need but is not receiving, including treatment for a fracture he allegedly suffered during his arrest, *id.* ¶ 55, examination by a neurologist, *id.* ¶ 56, physical therapy, *id.* ¶¶ 57-58, and denial of medication. *Id.* ¶ 61. As to Sheriff Prim and Chief Devane, plaintiff alleges that he has been denied proper footwear, and that he needs assistance in dressing, bathing and eating. *Id.* ¶¶ 60, 63. Plaintiff also alleges that he "has been reprimanded by correctional officers for enlisting other detainees' help in dressing, eating, and putting on his ankle brace" and has been "bullied and harass[ed]" by correction officers. *Id.* ¶¶ 65-66. These allegations do not allege a policy or practice. *Board of County Commissioners v. Brown*, 520 U.S. 397, 403 (1997) ("we have required a plaintiff seeking to impose liability on a municipality under § 1983 to identify a municipal 'policy' or 'custom' that caused the plaintiff's injury"); *McCauley v. City of Chicago*, 671 F.3d 611, 616 (7th Cir. 2011) ("McCauley was required to 'plead[] factual content that allows the court to draw the reasonable inference' that the City maintained a policy, custom, or practice . . ."), quoting *Ashcroft v. Iqbal,* 556 U.S. 662, 678 (2009).

Plaintiff fails to allege either an express policy or a custom or practice. To allege a custom or practice, plaintiff must allege other similar incidents that put the defendants on notice that a policy caused a constitutional violation. *Thomas v. Cook County Sheriff's Dep't,* 604 F.3d 293, 303 (7th Cir. 2009) ("there is no clear consensus as to how frequently such conduct must occur to impose *Monell* liability, 'except that it must be more than one instance,' [*Cosby v. Ward*], 843 F.2d 967, 983 (7th Cir. 1988), or even three, *Gable* [*v. City of Chicago*], 296 F.3d [531] at 538 [(7th Cir. 2002)]"). "[I]t is necessarily more difficult for a plaintiff to demonstrate an official policy or custom based only on his own experience because 'what is needed is evidence that here is a true municipal policy at issue, not a random event.'" *Phelan v. Cook County,* 463 F.3d 773, 789-90 (7th Cir. 2006), quoting *Calhoun v. Ramsey,* 408 F.3d 375, 380 (7th Cir. 2005); *Thomas,* 604 F.3d at 303 (same).

"While a complaint attacked by a Rule 12(b)(6) motion to dismiss does not need detailed factual allegations . . ., a plaintiff's obligation to provide the 'grounds' of his 'entitle[ment] to relief' requires more than labels and conclusions, and a formulaic recitation of the elements of a cause of action will not do . . .." *Twombly,* 550 U.S. at 555 (citations omitted).

Because plaintiff fails to allege a policy, custom or practice by the County that inflicted the injuries about which he complains, Count III of the amended complaint fails to state a claim against Defendants Prim and Devane, and they should be dismissed.

II. Count V Fails to State a Claim Against Defendants Prim and Devane.

Count V purports to allege a claim for unlawful retaliation against Defendants Prim and Devane under 42 U.S.C. § 1983. Am. Compl. (Doc. # 21), Ct. V. However, this count suffers from the identical deficiencies as discussed with respect to Count III, above. Because Prim and Devane are sued in their official capacities only, the claim is against the County. Accordingly, to state a claim, plaintiff must allege a custom, policy or practice, which he fails to do. Plaintiff alleges only that unnamed "security staff at the Jail . . . threaten[] him with placement in segregation whenever he asks for other detainees' assistance with his daily needs." *Id.* ¶ 99. Even assuming that such allegations state a claim for retaliation, because there is no *respondeat superior* liability, the allegations are insufficient. Count V should be dismissed.

III. Count VI Does Not State a Claim for Denial of Due Process.

Count VI purports to state a claim for denial of due process under the Fifth and Fourteenth Amendments. Plaintiff alleges that he has "a constitutional liberty interest in being free from physical restraints such as the hard metal shackles that are currently used on his hands and legs when he is transported out of the McHenry County Jail to go to immigration court hearings and the hospital." Am. Compl. (Doc. # 21) ¶ 103. In addition to the defects discussed above, this count is insufficient because there is no constitutional right for a person in custody to be transported free of restraints, such as handcuffs or shackles.

In addition, plaintiff complains that the Jail transport vans are not equipped with seatbelts, allegedly putting his safety at risk. Am. Compl. (Doc. # 21) ¶ 73. "As a general rule, inmates have no right to seatbelts in a transport bus. A failure either to provide seatbelts or to secure available seatbelts does not, by itself, constitute a substantial risk of serious harm rising to the level of a constitutional violation." *Taylor v. Stateville Dep't of Corr.*, No. 10 C 3700, 2010 Lexis 127378, 2010 WL 5014185 at *4 (N.D. Ill. Dec. 1, 2010), and cases cited therein.

Conclusion

For all of the reasons stated herein, defendants McHenry County, McHenry County Sheriff Bill Prim, and Chief David Devane request this Court to sever the claims against them and transfer them to the Western Division or, in the alternative, to dismiss them from Counts III, V and VI.

McHenry County, McHenry County Sheriff
Bill Prim and Chief David Devane

/s/George M. Hoffman
One of their attorneys

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CERTIFICATE OF SERVICE

I, George M. Hoffman, hereby certify that on May 25, 2017, I caused the foregoing **Memorandum of Law in Support of McHenry County Defendants' Motion to Sever and Transfer to the Western Division or, in the Alternative, to Dismiss Them from Counts III, V and VI of the Amended Complaint** to be served upon all counsel on the attached Service List by electronic filing via the CM/ECF system.

By: s/George M. Hoffman
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